

From: [Liu, Linda](#)
To: [Pease, Anita](#); [Miller, Robert](#)
Cc: [Panger, Melissa](#); [Kyprianou, Rose](#); [Hardy, Jacqueline](#); [Pease, Anita](#); [Terada, Derrick](#); [Schulze, Chad](#)
Subject: RE: Bioesque Botanical Disinfectant Solution
Date: Tuesday, November 24, 2020 12:35:58 PM

Hi Anita – Thank you for the cc! Washington State Department of Agriculture has assigned this incident to Neil Lanning, Western Washington Area Manager for Pesticide Compliance, and Neil is the point-of-contact for further questions.

Hi Bob – Neil will forward me the investigation report after the case is closed, and I will forward that report to you. If you reply to (b) (6), (b) (7)(C) email, you could say that the Washington State Department of Agriculture (WSDA) is aware of (b) (6), (b) (7)(C) incident. Neil Lanning is the point-of-contact at WSDA, and Neil's email address is nlanning@agr.wa.gov. WSDA will work with the Washington State Department of Health and Department of Labor and Industries and determine what has been investigated to date.

Please do not hesitate to let me know if you have any questions. Have a great day!
Linda

From: Pease, Anita <Pease.Anita@epa.gov>
Sent: Friday, November 20, 2020 9:32 AM
To: Hardy, Jacqueline <Hardy.Jacqueline@epa.gov>
Cc: Panger, Melissa <Panger.Melissa@epa.gov>; Kyprianou, Rose <Kyprianou.Rose@epa.gov>; Liu, Linda <Liu.Linda@epa.gov>; Miller, Robert <Miller.Robert@epa.gov>
Subject: RE: Bioesque Botanical Disinfectant Solution

Thanks for the information. Given the incident occurred in R9, we may want to coordinate w Linda Liu from EPA on messaging as least at in pertains to the incident in (b) (6), (b) (7)(C). Looping Linda in on this email.

Thanks,
Anita

From: Hardy, Jacqueline <Hardy.Jacqueline@epa.gov>
Sent: Friday, November 20, 2020 11:34 AM
To: Pease, Anita <Pease.Anita@epa.gov>
Cc: Panger, Melissa <Panger.Melissa@epa.gov>; Kyprianou, Rose <Kyprianou.Rose@epa.gov>
Subject: RE: Bioesque Botanical Disinfectant Solution

Good morning,

Based on the description from (b) (6), (b) (7)(C), it appears that the product may have been misused. The label has clear instructions on how to apply via fogging; however, I don't know what the device manufacturer's user guide suggests. In any case, the label directions indicate that the product may be applied via fogging as a "supplement to normal cleaning procedures for restoration and remediation products in confined vacant areas of schools, healthcare facilities, and HVA systems."

The directions are clear that the doors and windows should be sealed prior to fogging as well as ensuring the treated area is vacated during the treatment interval as specified by the device manufacturer. The instructions indicate that no one should enter the treated area until all fog has been settled or exhausted along with directions to ventilate the treated area until the air is purged of all suspended product.

I am interested to understand the intent behind the use of the fogging application (b) (6), (b) (7)(C) (b) (6), (b) (7)(C). The label clearly supports fogging directions for cleaning; however, it would appear the bus company is utilizing the fogging application as a means to mitigate the microorganisms listed on the label. It should be noted that this product is on List N, and SARS-CoV-2 claims were just approved.

I will also note that Rose and I had a conference call with Florida State Dept of Health and Pesticide Registration about this product. It appears that a company was going to FL school boards indicating this product would be useful via fogging to disinfect classrooms b/w periods. We had to explain to the state regulator's that the product doesn't impart any efficacy against the organisms listed on the label via fogging, and it would not be an appropriate option if their goal was disinfection against SARS-CoV-2.

What are the next steps?

Jacquie

From: Pease, Anita <Pease.Anita@epa.gov>
Sent: Friday, November 20, 2020 10:59 AM
To: Miller, Robert <Miller.Robert@epa.gov>; pesticidequestions <pesticidequestions@epa.gov>
Cc: Panger, Melissa <Panger.Melissa@epa.gov>; Liu, Linda <Liu.Linda@epa.gov>; Hardy, Jacqueline <Hardy.Jacqueline@epa.gov>
Subject: RE: Bioesque Botanical Disinfectant Solution

Thanks Bob for forwarding. Looping in the PM for this, Jacquie Hardy. Attached is the label:

https://www3.epa.gov/pesticides/chem_search/ppls/087742-00001-20190627.pdf

From: Miller, Robert <Miller.Robert@epa.gov>
Sent: Friday, November 20, 2020 10:51 AM
To: pesticidequestions <pesticidequestions@epa.gov>
Cc: Pease, Anita <Pease.Anita@epa.gov>; Panger, Melissa <Panger.Melissa@epa.gov>; Liu, Linda <Liu.Linda@epa.gov>
Subject: FW: Bioesque Botanical Disinfectant Solution

Hi Nicole,

I received an incident report from a (b) (6), (b) (7)(C) involving Bioesque Botanical Disinfectant Solution, 87742-1. You are better suited than me to answer the (b) (6), (b) (7)(C) complaint.

This is interesting because we are awaiting at least 6 incident reports involving Bioesque from public transit drivers in Oregon. Drivers are missing work and some have sought medical attention. Ventilation is limited on buses because windows do not open.

Take care,

Bob

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Robert A. Miller
6(a)(2) Coordinator
Information Services Branch (ISB)
U.S. EPA/OPP/RD
(703) 347-8012

From: (b) (6), (b) (7)(C)
Sent: Friday, November 20, 2020 9:46 AM
To: Miller, Robert <Miller.Robert@epa.gov>
Subject: Bioesque Botanical Disinfectant Solution

Dear Mr. Miller,

This may seem unusual to receive email from (b) (6), (b) (7)(C) but I have a concern about one of the disinfectants on your n list.

I am concerned that (b) (6), (b) (7)(C) is using the product incorrectly, not in accordance with the label instructions for fogging the product. The product is Bioesque Botanical Disinfectant Solution, 87742-1.

(b) (6), (b) (7)(C) C-Tran is a public transit organization. They are fogging the product in (b) (6), (b) (7)(C) buses and then drivers and passengers are boarding the bus, sometimes only minutes later. (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

I have attached the label that states ("fogging for restoration and remediation projects in vacant areas"), a picture of my arm, and links to the advertising on the manufacturer's web site about how safe the product is and that it can be used in a fogger or sprayer.

<https://bioesquesolutions.com/technology/>

I realize that I (b) (6), (b) (7)(C) but I just want to make sure (b) (6), (b) (7)(C) are safe. The label makes it sound like fogging is for special remediation projects in vacant spaces.

I appreciate your time.

Respectfully,

(b) (6), (b) (7)(C)